

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

JEFFERSON COUNTY, <i>et al.</i>,)	
)	
Plaintiffs,)	
)	
vs.)	CASE NO. 4:19-cv-00157-RLW
)	
DANNIE E. WILLIAMS, M.D., <i>et al.</i>,)	
)	
Defendants.)	

MOTION TO REMAND

Pursuant to 28 U.S.C. § 1447(c) and for the reasons set forth in Plaintiffs' Memorandum in Support of Motion to Remand, which Plaintiffs incorporate herein by reference, Plaintiffs move for an order remanding this action to the Circuit Court for the Twenty-Second Judicial Circuit, St. Louis City, Missouri, for lack of subject matter jurisdiction. Plaintiffs also seek such other and further relief as this Court may deem just and proper.

Dated: March 4, 2018

Respectfully submitted,

CAREY DANIS & LOWE

By: /s/ Jeffrey J. Lowe
Jeffrey J. Lowe #35114
John F. Garvey #35879
Sarah Shoemake Doles #45747
Alyson M. Petrick #68323
8235 Forsyth Boulevard, Suite 1100
St. Louis, Missouri 63105
(314) 725-7700
(314) 721-0905 (facsimile)
jlowe@careydanis.com
jgarvey@careydanis.com
sdoles@careydanis.com
apetrick@careydanis.com

HOLLORAN SCHWARTZ & GAERTNER

James P. Holloran
Anne Callis
9200 Litzsinger Road
St. Louis, MO 63144
(314) 772-8989
(314) 279-1333 (Facsimile)

**CHURMAN, HOWALD, WEBER,
SENKEL & NORRICK, L.L.C.**

Derek Good, #50300
P.O. Box 800 – 301 Main Street
Hillsboro, MO 63050
(636) 797-2601 / (636) 797-2904 - Facsimile
good@thurmanlaw.com

MARLER SCHRUM

Sara L. Marler, #55056
Scott J. Schrum, #67310
Ramona Gau, #58686
406 E. Karsch Blvd.
Farmington, Missouri 63640
(573) 747-4573
(573) 747-4940 - Facsimile
smarler@marlerschrum.com
sschrum@marlerschrum.com
rgau@marlerschrum.com

STYRON & SHILLING

Patricia J. Shilling, #36356
302 E. Church Street
Ozark, Missouri 65721
(417) 581-3646
pjs@styronlaw.com

STRONG-GARNER-BAUER, P.C.

Steve Garner, #35899
Neil Chanter, #49507
Jeff Bauer, #48902
415 E. Chestnut Expressway
Springfield, MO 658002
(417) 887-4300
(417) 887-4385 (Facsimile)
sgarner@stronglaw.com

neilchanter@stronglaw.com
jbauer@stronglaw.com

**THE LAW OFFICE OF CHRIS R. MILTENBERGER,
PLLC**

Chris R. Miltenberger
1360 N. White Chapel, Suite 200
Southlake, Texas 76092
817-416-5060 (office)
817-416-5062 (fax)
chris@crmlawpractice.com

SIMON GREENSTONE PANATIER, P.C.

Jeffrey B. Simon
TX State Bar No. 0078842
1201 Elm Street, Suite 3400
Dallas, Texas 75270
Tel: (214) 276-7680
Fax: (214) 276-7699
jsimon@sgptrial.com

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 4th day of March, 2019, the foregoing was filed using the Court's electronic case filing system, thereby serving all registered attorneys of record.

/s/ Jeffrey J. Lowe
Jeffrey J. Lowe